

**UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS**

SHEILA PORTER,
Plaintiff

v.

ANDREA CABRAL, SUFFOLK
COUNTY SHERIFF'S DEPARTMENT,
SUFFOLK COUNTY,
Defendants

**DEFENDANTS' MOTION FOR LEAVE TO FILE MEMORANDUM
IN EXCESS OF TWENTY PAGES**

Now come the Defendants, Andrea Cabral, Suffolk County Sheriff's Department, Suffolk County and hereby move that this Honorable Court grant them leave to file a memorandum of law in excess of the twenty page limit of L.R. 7.1(B)(4). Defendants' Memorandum of Law in Support of Their Motions For New Trial and Remittitur is 44 pages in length. As grounds therefore, the Defendants state:

1. The trial in this matter encompassed six days, including the testimony of ten witnesses, argument and charge.
2. The issues tried before the jury included constitutional violations and common law claims.
3. The issues raised by the Defendants in their Motions For a New Trial and Remittitur cannot be adequately addressed in a memorandum of twenty pages in the circumstances of this case.

Wherefore, the Defendants respectfully request that this Honorable Court grant their request to exceed the page limitations of Local Rule 7.1(B)(4) and allow them to file a forty-four page Memorandum of Law in Support of Their Motions For New Trial and Remittitur pursuant to Fed.R.Civ.P. 59.

Respectfully submitted,
For the Defendants
By their Attorney,

/s/ Ellen M. Caulo
Ellen M. Caulo, BBO #545250
Deputy General Counsel
Suffolk County Sheriff's Department
200 Nashua Street
Boston, MA 02114
(617) 961-6681

Date: February 2, 2006

Local Rule Certification

I, Ellen M. Caulo, hereby certify pursuant to Local Rule 7.1 that I have conferred with counsel for the Plaintiff and **that counsel has assented to this motion.**

/s/ Ellen M. Caulo
Ellen M. Caulo